

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2021 AUG 12 PM 2:51

UNITED STATES OF AMERICA

v.

GEORGE CASEY,  
Defendant.

Criminal No.

21-cr-80-1

CLERK

BY LAW  
DEPUTY CLERK

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Michael McCullagh, being duly sworn, depose and state as follows:

**BACKGROUND OF AFFIANT**

1. I am a Special Agent with Homeland Security Investigations ("HSI"), and I have been employed by HSI as a Special Agent since July of 2002. Upon graduating from the Federal Law Enforcement Training Center, I was assigned as a Special Agent for the U.S. Customs Service in the Special Agent in Charge (SAC) New York Office in New York City. In October 2007, I transferred to the Burlington, Vermont Resident Agent in Charge Office, where I presently work. I hold a Bachelor of Science degree in Business Administration from Saint Michael's College. I have been a computer forensic agent ("CFA") for my agency since 2006 and have participated in many child pornography and child exploitation investigations. Prior to my employment with HSI, I was a police officer with the Winooski, Vermont Police Department.

2. I have received extensive training provided by the Federal Law Enforcement Training Center and HSI in the investigation and enforcement of laws of the United States. I have received training specifically in the area of child pornography (as defined in 18 U.S.C. § 2256) and child exploitation. I have, as part of my daily duties as an HSI Special Agent, investigated violations relating to child exploitation and child pornography, including violations pertaining to the possession, distribution, receipt and production of child pornography, the online enticement of

minors, and traveling in interstate and foreign commerce to engage in sexual activity with minors, in violation of 18 U.S.C. §§ 2251, 2252, 2252A, 2422, and 2423. I have participated in the execution of numerous search and arrest warrants involving child exploitation and/or child pornography offenses.

3. This affidavit is being submitted in support of a Criminal Complaint for George CASEY (“CASEY”) for violations of 18 U.S.C. § 2251(a)(1) - Production of Child Pornography, and 18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography (collectively the “TARGET OFFENSES”).

4. The statements contained in this affidavit are based in part on information provided by members of local, state, and federal law enforcement, my own investigation to include personal observations, documents, and other investigative materials that I have reviewed, as well as my training and experience as a Special Agent with HSI. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that CASEY has committed the TARGET OFFENSES. Where I describe a statement, it is described in substance, not verbatim, unless otherwise noted.

#### **PROBABLE CAUSE**

5. Based on my review of documents, specifically an application for a state warrant to search 139 Gilman Circle #4, Colchester, Vermont dated March 5, 2021 (the “Affidavit”), and discussions with law enforcement officers, I learned that on July 31, 2020, Detective Trooper David Hurwitch, assigned to the Chittenden Unit for Special Investigations (“CUSI”), received a report from the Colchester Police Department. This report alleged that a male, later identified as George CASEY, had touched a six-year-old female child’s vaginal area over her clothes. This

child is referred to herein as “Victim 1.”<sup>1</sup> This incident was reported by Victim 1’s mother, who also advised law enforcement that she had learned that a neighbor’s child, hereafter referred to as “Victim 2,” was digitally penetrated by CASEY. Victim 2 was a five-year-old female child at the time of this incident.

6. The Affidavit contains details of an interview of Victim 2 by a CUSI investigator that took place on August 4, 2020. In this interview, Victim 2 disclosed the following:

- a. Victim 2 spoke about her friend, hereafter referred to as Victim 3.
- b. Victim 2 said that Victim 3 lives with her dad and “the one who does all the inappropriate stuff,” whom Victim 2 identified as Victim 3’s family member.
- c. Victim 2 advised that CASEY takes off Victim 3’s pants as well as his own pants.

7. The Affidavit detailed an interview of Victim 3 by a CUSI investigator that took place on August 4, 2020. Victim 3 was a seven-year-old female child at the time of this incident. In this interview, Victim 3 disclosed the following:

- a. Early on in the interview, Victim 3 advised the investigator, “I kinda forgot what happened a little bit after that cause it’s like I have too much other stuff in my mind going on right now.”
- b. Victim 3 would play games with her family member (CASEY), such as Fortnite and Minecraft. While playing games, Victim 3 would observe CASEY rubbing his privates. Victim 3 gestured to show this behavior to the investigator with her hand in front of her groin area and moving her hand up and down. Victim 3 was not able to tell the investigator the name of the private part but explained that he used that part of his body to pee. When asked what CASEY looked like when he was

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<sup>1</sup> The identities of the minor children referred to herein are known to law enforcement.

rubbing his privates, Victim 3 responded, "I don't know, kind of like a happy face smile."

8. The Affidavit also included details of a September 24, 2020 interview by Detective Hurwitch of Victim 3's father, J.H., at the Colchester, Vermont Police Department. During this interview, J.H. was accompanied by Shannon Naylor, an adult friend of both him and Victim 3.

In this interview, the following information was learned:

- a. Shannon advised that while at the residence to see J.H., she walked past CASEY's room and observed him masturbating through the open door. Shannon further advised that CASEY does not have good social skills and would mostly talk about sexual and gaming stuff with her.
- b. Shannon advised that Victim 3 had told her previously she does not like it "when the boys walk in on me when I'm in the bathroom at night," mostly George (CASEY).
- c. Shannon advised that about three weeks earlier, she spoke with CASEY and he stated, "well I guess I deleted all my porn for nothing" because the police are not coming. Shannon also advised that CASEY has an interest in weird sex toys and anime porn.
- d. J.H. said that he wanted CASEY to move. J.H. also said that it would not go well if CASEY was to be arrested.

9. On March 11, 2021, a state search warrant was executed at CASEY's residence, located at 139 Gilman Circle, #4, Colchester, Vermont. CASEY lived with two relatives at the location. Investigators were told by the occupants of the residence which bedroom CASEY lived in. Investigators also found a piece of mail addressed to CASEY from Comcast in this bedroom.

This piece of mail was photographed in place. I have viewed the photograph and observed that the mail was addressed to CASEY at 139 Gilman Cir, Apt 4, Colchester. In CASEY's bedroom, a number of electronic media devices were seized. These devices were sent to the Vermont State Police Computer Crime Unit for forensic analysis. Analysis of these devices was assigned to Detective Sergeant Eric Jollymore, a computer forensic examiner assigned to the Bureau of Criminal Investigation – Computer Crime Unit.

10. On August 6, 2021, Det. Jollymore submitted a sworn affidavit providing a brief synopsis of his findings. I also spoke with Det. Jollymore about this affidavit and the status of his analysis. He advised that his forensic examination is not complete due to the large volume of electronic files. Det. Jollymore also provided five video files as well as some metadata about the files, such as their file paths.

11. In his affidavit, as well as the other supporting documentation, Det. Jollymore provided the following information:

- a. He located several hundred thousand media files, to include several concerning files that were located on a Seagate external hard drive, which had been seized as part of this investigation.
- b. Within the Seagate drive, there were numerous directories, two of which contained video files documenting produced child sexual abuse.
- c. Also on the Seagate external hard drive, Det. Jollymore found a file titled "me.jpg." The photo in this file is a close-up photo depicting an adult male's face. I recognize the depicted male to be CASEY from having viewed his driver's license photo and from having spoken to him in person.

d. The two directories were titled:

“hentai\hentai\Hentai\nsfw\Hentai32\photorealistic\nsfw\BlackUSBFiles\Hentai\New folder\New folder\ New folder\ New folder\ New folder\ New folder\ New folder\misc\Various Files 5\NSFW\tasty yum yums\XXXXXX & Friend”<sup>2</sup> and  
“hentai\hentai\h2\Hentai32\photorealistic\nsfw\BlackUSBFiles\Hentai\New folder\New folder\ New folder\ New folder\ New folder\ New folder\ New folder\misc\Various Files 5\NSFW\tasty yum yums\XXXXXX & Friend.”

e. Based on my training and experience, I know that “NSFW” is a common acronym for “Not Safe for Work.” I also know that “Hentai” is a type of pornography involving hand drawn or computer animation which originated in Japan.

f. Det. Jollymore described five of the videos he located in these directories on the Seagate external hard drive. For the purposes of this affidavit, I have substituted the initials of the child victims from Det. Jollymore’s affidavit to their corresponding victim number within this affidavit. Det. Jollymore’s descriptions of what is depicted in these video files follow:

i. V00705-142608.mp4 – A 26 second video file, depicting Victim 3 sitting on an office chair in a pink camouflage bathing suit. In the left hand of Victim 3 is a corded, dark colored object with a red light. This object was placed directly in the front of the crotch of Victim 3. After several seconds of video recording, an adult sized left hand can be seen approaching the crotch of Victim 3 and placing their fingers in front of the clothed vagina. The fingers of this unknown adult hand can be seen pressing forward and

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<sup>2</sup> The file title accurately identifies the family relation between Victim 3 and CASEY. The family relation identifier has been replaced with XXXXXX.

backwards rapidly up against the crotch of Victim 3. This file maintained an EXIF CreateDate of 07/05/2020.

- ii. V00705-154708.mp4 – A one minute and fifteen second video file, depicting Victim 2 and Victim 3 both on their hands and knees. Victim 3 can be seen in the same pink camouflage bathing suit. Victim 2 was partially clothed; her panties were down by her knees and her dress was pulled up above her waist making her bare buttocks visible to the camera. After several seconds, the camera moves closer to Victim 2. An adult sized left hand can be seen entering the view of the camera and is placed on the buttocks of Victim 2. After several moments, the same hand proceeds to spread the buttocks of Victim 2 exposing the vagina of the minor. Using that same hand, the individual inserts their pointer finger into the vagina of Victim 2 and repeatedly inserts and removes the finger in a pulsing motion. The bed spread seen in this video matches the decorative color and pattern as a bed spread seen in the search warrant photos taken of a bedroom during the execution of a residential search warrant by investigators. This file maintained an EXIF CreateDate of 07/05/2020.
- iii. V00705-155453.mp4 – A thirty-one second video file, depicting Victim 2 and Victim 3 in front of a male who was laying on a bed nude from the waist down. Victim 3 can be seen in the same pink camouflage bathing suit. Victim 2 was also seen in the same white floral dress. In this video, Victim 3 can be seen approaching this male who was holding their penis with their left hand. After several moments, Victim 3 can be seen placing

their mouth on this penis. Victim 3 backs away from the penis and then after several moments returns and places their mouth on the penis a second time within the same video. Both acts were completed in view of Victim 2. The bed spread seen in this video matches the decorative color and pattern as a bed spread seen in the search warrant photos taken of a bedroom during the execution of a residential search warrant by investigators. This file maintained an EXIF CreateDate of 07/05/2020.

- iv. V00705-145016.mp4 – A thirty-eight second video file, depicting Victim 2 and Victim 3 in front of a male who was laying on a bed with their penis exposed to the camera. In the view of the camera and both Victim 2 and Victim 3 the male can be seen masturbating using their left hand. Victim 3 can be seen in the same pink camouflage bathing suit. Victim 2 can also be seen in the same white floral dress. After several moments, Victim 2 and Victim 3 engage in a brief dialogue while the male manipulates his penis. Victim 2 can be seen hesitating before slowly leaning forward to take hold of the penis from the male. Victim 2 moves her hand several times up and down the shaft of the penis before releasing it. The bed spread seen in this video matches the decorative color and pattern as a bed spread seen in the search warrant photos taken of a bedroom during the execution of a residential search warrant by investigators. This file maintained an EXIF CreateDate of 07/05/2020.
- v. V00709-123838.mp4 – A two minute and fifty-four second video file in length. This video immediately started jumbled with movement and



depicted a juvenile lowering their shorts to expose their buttocks to the camera.<sup>3</sup> Also in view, was a male nude from the waist down who was manipulating their penis with their left hand. The camera then focuses on the nude buttocks of a juvenile who lowers themselves onto the penis of this male. The right hand of the juvenile can be seen attempting to guide the penis towards their buttocks. The male proceeded to thrust several times into the buttocks area of this juvenile. There is a large portion of time in this video that is then black with no visible action having taken place. At two minutes and twenty-seven seconds, the male can be seen sitting back down on the bed. In the view of the camera is Victim 2 who is standing in the corner of the room observing the action. Victim 2 was not seen in the beginning of this video. The face and body of a male can be seen in this video including a small, dark colored, possible tattoo on their right shoulder. The bed spread seen in this video matches the decorative color and pattern as a bed spread seen in the search warrant photos taken of a bedroom during the execution of a residential search warrant by investigators. This file maintained an EXIF CreateDate of 07/09/2020.

12. I have viewed the five videos described in this affidavit and agree with the descriptions provided by Det. Jollymore. In my review, I observed that both of the female child victims appear to be within their actual ages at the time the video was created in 2020, five and seven years old. I also observed that Victim 2 does not have any pubic hair present as depicted in one of the videos. I have also viewed photographs taken of CASEY's bedroom during execution

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<sup>3</sup> Based on my review of this video and the other materials in this matter, I believe that this juvenile is Victim 3.

of the search warrant. The distinctive bed spread seen in the videos found described in this affidavit appears to be the same bed spread seen in the search warrant photos of CASEY's bedroom.

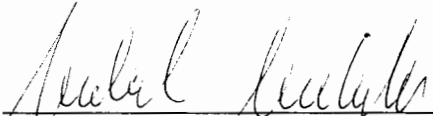
13. As indicated by Det. Jollymore, an adult male's face is captured in video V00709-123838.mp4. I have viewed CASEY's Vermont Driver's License photograph and met him in person. I believe that he is the male shown in that video.

14. I have spoken with Det. Hurwitch, who has also viewed the five videos described in this affidavit. Det. Hurwitch recognized the male in video, V00709-123838.mp4, as George CASEY, whom he has met in person. Det. Hurwitch also recognized both Victim 2 and Victim 3 from the five videos, as he has also met them in person and identified them as children.

15. Based on my training and experience, I know that the Seagate external hard drives are made and manufactured outside the State of Vermont. Specifically, Seagate external hard drives are made in China.

**CONCLUSION**

16. Based on my training and experience and the facts set forth in this Affidavit, I believe that there is probable cause to believe that violations of 18 U.S.C. § 2251(a)(1) - Production of Child Pornography, and 18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography have been committed by CASEY.

  
Special Agent Michael McCullagh  
Department of Homeland Security  
Homeland Security Investigations

Subscribed and sworn to before me this 12<sup>th</sup> day of August, 2021.

  
HON. KEVIN J. DOYLE  
UNITED STATES MAGISTRATE JUDGE